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November 25, 1996

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

Re: Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Stations  
(Brodhead, Mount Vernon and Stanford, Kentucky)  
MM Docket No. 96-202, RM-8879

Dear Mr. Caton:

Transmitted herewith on behalf of Rock Communications of Mount Vernon are an original and four copies of its Comments and Counterproposal in the above-referenced proceeding which proposes to allot Channel 270A to Brodhead, Kentucky.

If there are any questions regarding this matter, please contact the undersigned directly.

Sincerely,

  
John F. Garziglia

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

NOV 25 1996

Federal Communications Commission  
Office of General Counsel

In the Matter of

Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Brodhead, Mount Vernon and  
Stanford, Kentucky)

)  
)  
) MM Docket No. 96-202  
) RM-8879  
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To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL

Rock Communications of Mount Vernon, by its attorneys, pursuant to Notice of Proposed Rule Making, DA 96-1626, released October 4, 1996, hereby submits further comments and a counter-proposal in this proceeding. It is proposed that the FM Table of Allotments be amended to provide first local transmission service to Brodhead, Kentucky as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Brodhead, Kentucky	--	270A <sup>1/</sup>

Rock Communications of Mount Vernon has a present intention to apply for the Brodhead allotment, if allotted, and if authorized, to build a station promptly.

Brodhead, Kentucky has a population of 1,140 persons (1990 U.S. Census data) and is a self-governing community with a mayor and a city council. Brodhead has its own fire department, its

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<sup>1/</sup> As shown in the attached channel study, FM Channel 270A may be allotted to Brodhead, Kentucky consistent with all Commission spacing rules at reference coordinates of 37° 22' 29" North Latitude, 84° 26' 41" West Longitude, a site approximately 4.3 kilometers northwest of Brodhead.

own police department and its own local post office. Several significant businesses are located in Brodhead, including a nursing home with approximately 100 employees, a produce company with 50 to 75 employees and a bank. Education is provided by Brodhead Elementary School. Several churches are located in Brodhead.

Brodhead, as an incorporated community listed in the U.S. Census with municipal services and businesses that regard the community as their nexus of operations, is a licensable community for the purpose of the allotment of Channel 270A. Further, since the allotment of Channel 270A will provide first local transmission service to Brodhead, it should be preferred over an allotment of Channel 270A to either Stanford, Kentucky<sup>2/</sup> or to Mt. Vernon, Kentucky.

Respectfully submitted,

**ROCK COMMUNICATIONS OF MOUNT VERNON**

By: \_\_\_\_\_

  
John F. Garziglia  
Its Attorney

Pepper & Corazzini, L.L.P.  
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(202) 296-0600

November 25, 1996

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<sup>2/</sup> On November 22, 1996, Williams Communications, Inc. filed a counterproposal in this proceeding requesting the allotment of Channel 270A to Stanford, Kentucky.

PEPPER & CORAZZINI L.L.P.  
Washington D.C. 20006

New Allotment to Brodhead, Kentucky as  
First Local Transmission Service


REFERENCE		CLASS A	DISPLAY DATES
37 22 29 N			DATA 11-01-96
84 26 41 W		Current rules spacings	SEARCH 11-25-96
----- CHANNEL 270 -101.9 MHz -----			

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN	
AD270	270A	Mount Vernon	KY	0.0	0.00	115.0	-115.00	*
WLJC	271A	Beattyville	KY	68.7	71.71	72.0	-0.29	*
WKYM	269A	Monticello	KY	209.7	72.16	72.0	0.16	<
WLLK	272A	Somerset	KY	212.1	38.87	31.0	7.87	
WKYL	271A	Lawrenceburg	KY	332.1	82.06	72.0	10.06	
WLRO.A	268C3	Richmond	KY	10.5	56.96	42.0	14.96	
WLRO	268C3	Richmond	KY	10.5	56.96	42.0	14.96	
WKRQ	270B	Cincinnati	OH	358.6	193.36	178.0	15.36	
WLTO	273A	Nicholasville	KY	354.0	50.93	31.0	19.93	
WUKY	217C	Lexington	KY	335.8	50.40	29.0	21.40	
WQXQ	270C1	Central City	KY	276.7	226.45	200.0	26.45	
WTHQ	269A	Shelbyville	KY	325.8	112.95	72.0	40.95	
WVOWFM	270B	Logan	WV	75.4	224.88	178.0	46.88	

**CERTIFICATE OF SERVICE**

I, Tracey S. Westbrook, a secretary with the law firm of Pepper & Corazzini, L.L.P., hereby certify that true and correct copies of the foregoing "Comments and Counterproposal" were served by U.S. mail, postage prepaid, first-class on the 25th day of November, 1996, upon the following individuals:

- \* Ms. Sharon P. McDonald  
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Tracey S. Westbrook

\* - HAND DELIVERY